

EXHIBIT A

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ALICE HOWELL, Independent Administrator of the Estate of JUSTUS HOWELL, deceased,)	
)	
Plaintiff,)	No. 16-cv-03949
)	
vs.)	Judge Thomas M. Durkin
)	
CITY OF ZION, a municipal corporation, OFFICER ERIC HILL, (#47),)	Magistrate Judge Sidney I. Schenkier
)	
Defendants.)	JURY TRIAL DEMANDED

**PLAINTIFF'S COMBINED RESPONSE TO DEFENDANTS'
SECOND SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO PLAINTIFF
AND SECOND SET OF INTERROGATORIES TO PLAINTIFF**

The plaintiff submits the following responses to Defendants' Second Requests for Production of Documents and Defendants' Second Set of Interrogatories.

**PLAINTIFF'S RESPONSE TO DEFENDANTS' SECOND SET OF
REQUESTS FOR PRODUCTION OF DOCUMENTS TO PLAINTIFF**

1. Any documents referenced in or relied upon for Plaintiff's Answers to Defendants' Second Set of Interrogatories.

RESPONSE: See Attached "Original Income Withholding Order/Notice for Support."

2. All documentation and other evidence that establishes Arnold Howard is the legal father of Justus Howell. This specifically includes, but is not limited to, a Voluntary Acknowledgement of Paternity, an Administrative Paternity Order, an Order of Paternity, and/or paternity test results.

RESPONSE: See Attached "Original Income Withholding Order/Notice for Support."

3. Documentation and records from any court proceedings related to paternity, custody and/or child support payments of Justus Howell. This includes proceedings before any

administrative agency and/or court of law.

RESPONSE: See Attached “Original Income Withholding Order/Notice for Support.”

4. Documents and records of child support payments made for Justus Howell, including court orders, payment schedules, and receipts.

RESPONSE: See Attached “Original Income Withholding Order/Notice for Support.”

PLAINTIFF'S RESPONSE TO DEFENDANTS'
SECOND SET OF INTERROGATORIES TO PLAINTIFF

1. Is Arnold Howell the biological and/or legal father of Justus Howell?

ANSWER: Yes.

2. Identify all documentation and other evidence that establishes Arnold Howard is the legal father of Justus Howell. This specifically includes, but is not limited to, a Voluntary Acknowledgement of Paternity, an Administrative Paternity Order, an Order of Paternity, and/or paternity test results.

ANSWER: See the Attached “Original Income Withholding Order/Notice for Support.”

3. Was an Order of Paternity entered establishing Arnold Howard as the legal father of Justus Howell? If so, identify the date, jurisdiction, and judge that entered such an Order.

ANSWER: Yes. See Attached “Original Income Withholding Order/Notice for Support.”

4. Did Arnold Howard pay child support for Justus Howell? If so, identify the dates of payments, amounts of payments, frequency of payments, and to whom the payments were made.

ANSWER: Yes. See Attached “Original Income Withholding Order/Notice for Support.”

5. Was Arnold Howard ever ordered to pay child support for Justus Howell? If so, identify the date, jurisdiction, and judge that entered such an Order.

ANSWER: Yes. See Attached “Original Income Withholding Order/Notice for Support.”

August 14, 2017

/s/Andrew Stroth

Andrew M. Stroth
Action Injury Law Group, LLC
191 North Wacker Drive, Suite 2300
Chicago, IL 60606
Tel: (312) 771-2444
Fax: (312) 641-6866
astroth@actioninjurylawgroup.com

Carlton Odim
Odim Law Offices
225 West Washington Street, Suite 2200
Chicago, Illinois 60606
Tel: (312) 578-9390
Fax: (312) 924-0201
carlton@odimlaw.com

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

The undersigned, one of the attorneys of record herein, hereby certifies that on August 14, 2017 the foregoing **COMBINED ANSWERS TO DEFENDANTS' SECOND SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO PLAINTIFF AND SECOND SET OF INTERROGATORIES TO PLAINTIFF** was sent via e-mail to the following:

Thomas DiCianni
Elizabeth K. Barton
Ancel, Glink, Diamond, Bush, Dicianni & Krafthefer, P.C.
140 South Dearborn Street
Sixth Floor
Chicago, Illinois 60603
tdicianni@ancelglink.com
ebarton@ancelglink.com

/s/ Carlton Odim

Carlton Odim
Odum Law Offices
225 West Washington Street
Suite 2200
Chicago, Illinois 60606
Tel: (312) 578-9390
Fax: (312) 924-0201
carlton@odimlaw.com

INCOME WITHHOLDING FOR SUPPORT

ORIGINAL INCOME WITHHOLDING ORDER/NOTICE FOR SUPPORT (IWO)
 AMENDED IWO
 ONE-TIME ORDER/NOTICE FOR LUMP-SUM PAYMENT
 TERMINATION of IWO

Date: APRIL 11, 2013

[X] Child Support Enforcement (CSE) Agency [] Court [] Attorney [] Private Individual/Entity (Check One)

State/Tribe/Territory WISCONSIN
 City/County/Dist./Tribe KENOSHA County
 Private Individual/Entity

Remittance Identifier (Include w/ payment)
 Order Identifier
 CSE Agency Case Identifier (PIN)

PAM'S BEAUTY & HAIR CARE
 1209 26TH ST
 ZION IL 60099

Re: HOWARD ARNOLD A
 Employee/Obligor's Name (Last, First, Middle)

██████████
 Employee/Obligor's Social Security Number

HOWELL LATOYA A
 Custodial Party/Obligee's Name (Last, First, Middle)

Employer/Income Withholder's Name & Address

Employer/Income Withholder's FEIN

Child's Name and Birth Date:

JUSTUS D HOWELL
 ██████████

If you receive the National Medical Support Notice, review the notice for specific requirements for enrolling the children.

ORDER INFORMATION: This document is based on the support or withholding order from Wisconsin. You are required by law to deduct these amounts from the employee/obligor's income until further notice.

\$55.57 per WEEK current child support

for a Total Amount to Withhold of \$55.57 per WEEK.

AMOUNTS TO WITHHOLD: You do not have to vary your pay cycle to be in compliance with the Order Information. If your pay cycle does not match the ordered payment cycle, withhold one of the following amounts:

\$ 55.57 per weekly pay period	\$ 120.40 per semimonthly pay period (twice a month)
\$ 111.14 per biweekly pay period (every two weeks)	\$ 240.80 per monthly pay period

\$ _____ Lump-Sum Payment: Do not stop any existing IWO unless you receive a termination order.

REMITTANCE INFORMATION: If employee/obligor's (employee's) principal place of employment is WISCONSIN, you must begin withholding no later than the first pay period that occurs 5 days after the date of this IWO. Send payment within 5 working days of the pay date. If you can't withhold the full amount of support for any or all IWOs for this employee, withhold up to 50% of disposable income for all orders. If employee's principal place of employment is not WISCONSIN, obtain withholding limitations, time requirements, & any allowable fees at http://www.acf.hhs.gov/programs/cse/newhire/employer/contacts/contact_map.htm for the principal place of employment. For electronic payment requirements and State Disbursement Unit (SDU) information, see the website listed immediately above.

Include the Remittance Identifier (PIN) with payment and if necessary this FIPS code: 55200. Remit payment to: WI SCTF, Box 74400, Milwaukee WI 53274-0400.

[] Return to Sender [Completed by Employer/Income Withholder]. Payment must be directed to an SDU in accordance with 42 USC §666(b)(5) and (b)(6) or Tribal Payee (see Payments to SDU, p.2). If payment is not directed to an SDU/Tribal Payee or this IWO is not regular on its face, you must check this box and return the IWO to the sender.

Signature of Judge/Issuing Official (not required by Wisconsin law):

Print Name of Judge/Issuing Official:

Title of Judge/Issuing Official:

Date: _____
MARNI E SORCE
 Child Support Worker

CONTACT INFORMATION: To employer/income withholder, employee/obligor Questions? Contact the KENOSHA County Child Support Agency by phone at (262) 697-4500 or by fax at (262) 697-4745

Employer, send termination/income status notice and other correspondence to: KENOSHA CO CHILD SUPPORT AGENCY, 8600 SHERIDAN RD STE 301, KENOSHA WI 53143 6505

From: Barton, Elizabeth
Sent: Friday, September 01, 2017 3:07 PM
To: 'Carlton Odim'; DiCianni, Thomas
Cc: Andrew Stroth; Turner, Kathleen
Subject: RE: Howell v. Zion

Counsel,

The document you produced did not appear to be an Order entered by a court. Was there an order establishing paternity? If so, please provide that.

Elizabeth Barton
Ext. 9183

From: Carlton Odim [mailto:carlton@actioninjurylawgroup.com]
Sent: Monday, August 14, 2017 8:48 AM
To: Barton, Elizabeth; DiCianni, Thomas
Cc: Andrew Stroth
Subject: Howell v. Zion

Liz,

Attached are the answers to Defendants' Second set of Interrogatories and Requests for Production to Plaintiff.

Carlton